

# EXHIBIT 3

**From:** McGonagle, Dan  
**Sent:** Thursday, April 15, 2021 7:25 PM  
**To:** 'Jay Rapaport'; csun@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvpsingular@keker.com; mkamber@keker.com; dshah@keker.com  
**Cc:** Singular  
**Subject:** RE: Singular Computing LLC v. Google LLC

Jay,

As your note suggests, there are only a “handful of documents” that we referenced in our letter. It has been a week since we brought this issue to your attention, therefore, we so no reason to further delay producing the material.

The material referenced in our correspondence are documents that are relied upon by Google for key data points in material that you have already produced. They are relevant and responsive to our RFPs. A non-exhaustive list of RFPs that call for production of the referenced documents include Nos. 44, 51, 52, 56, 59, 66, 69-75, 78-79, 83, and 99.

Given the above, we need a date with which this material will be produced or we can add this as an agenda item for tomorrow’s discussion.

Thanks,  
Dan

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**From:** Jay Rapaport [mailto:jrapaport@keker.com]  
**Sent:** Wednesday, April 14, 2021 7:17 PM  
**To:** McGonagle, Dan <DMcGonagle@princetonobel.com>; csun@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvpsingular@keker.com; mkamber@keker.com; dshah@keker.com  
**Cc:** Singular <Singular@princetonobel.com>  
**Subject:** RE: Singular Computing LLC v. Google LLC

Dan,

We are not refusing to produce anything; we are working to re-image the documents already produced and to locate the additional ones you requested so they can be processed, reviewed, and, if responsive to your RFPs, produced. We hope to complete these tasks soon, but they do take some time.

To the extent your email implies that Google’s previous search and production was somehow deficient because it did not catch a handful of documents you have flagged, Singular’s point is not well-taken. Google conducted a thorough, diligent search and produced a massive volume of information on a brisk schedule. It is perfectly fine for Singular to ask follow-up questions, but Singular has no basis for implying that Google’s efforts were anything less than thorough.

Best,

Jay

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**Jay Rapaport**  
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**From:** McGonagle, Dan <[dmcgonagle@princelobel.com](mailto:dmcgonagle@princelobel.com)>  
**Sent:** Wednesday, April 14, 2021 6:21 AM  
**To:** Christopher S. Sun <[CSun@keker.com](mailto:CSun@keker.com)>; [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com); [mkwun@kblfirm.com](mailto:mkwun@kblfirm.com); [nhueston@kblfirm.com](mailto:nhueston@kblfirm.com); [kvp-singular@keker.com](mailto:kvp-singular@keker.com); Matthias Kamber <[MKamber@keker.com](mailto:MKamber@keker.com)>; Deeva V. Shah <[DS Shah@keker.com](mailto:DS Shah@keker.com)>  
**Cc:** [singular@princelobel.com](mailto:singular@princelobel.com)  
**Subject:** RE: Singular Computing LLC v. Google LLC

[EXTERNAL]

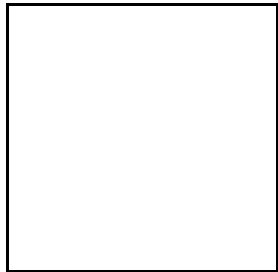
Chris,  
Our request was pretty straightforward. The documents referenced in our letter are quite obviously relevant and should have been produced already. If you are refusing to produce these documents, please let me know. We can address your concerns in the upcoming meet and confer scheduled for this Friday between the parties.

Thanks,  
Dan McGonagle



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617.456.8081 Direct  
[dmcgonagle@princelobel.com](mailto:dmcgonagle@princelobel.com)



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**From:** Christopher S. Sun [<mailto:csun@keker.com>]  
**Sent:** Monday, April 12, 2021 4:35 PM  
**To:** McGonagle, Dan <[DMcGonagle@princelobel.com](mailto:DMcGonagle@princelobel.com)>; [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com); [mkwun@kblfirm.com](mailto:mkwun@kblfirm.com); [nhueston@kblfirm.com](mailto:nhueston@kblfirm.com); [kvp-singular@keker.com](mailto:kvp-singular@keker.com); [mkamber@keker.com](mailto:mkamber@keker.com); [dshah@keker.com](mailto:dshah@keker.com)  
**Cc:** Singular <[Singular@princelobel.com](mailto:Singular@princelobel.com)>  
**Subject:** RE: Singular Computing LLC v. Google LLC

Hi Dan,

We are receipt of your letter and are looking into the questions it asks. We will follow up shortly.

Chris

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**From:** McGonagle, Dan <[dmcgonagle@princelobel.com](mailto:dmcgonagle@princelobel.com)>  
**Sent:** Tuesday, April 6, 2021 12:17 PM  
**To:** [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com); [mkwun@kblfirm.com](mailto:mkwun@kblfirm.com); [nhueston@kblfirm.com](mailto:nhueston@kblfirm.com); [2](mailto:kvp-</a></p></div><div data-bbox=)

Cc: [singular@princelobel.com](mailto:singular@princelobel.com)

Subject: Singular Computing LLC v. Google LLC

[EXTERNAL]

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Counsel,  
Please find the attached correspondence.

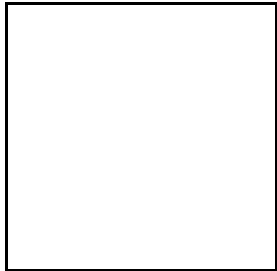
Regards,

Dan McGonagle



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